

Comment on Permit #PAS2D702BALL

Non-responsive based on revised scope.

To: R3 UIC Mailbox R3 UIC Mailbox @epa.gov

RDA *Responsible Decarbonization Alliance*

PO Box 502 // Williamsport PA 17703-0502 // www.rdaPA.org

July 11, 2022

Attn: Ryan Hancharick Source Water & UIC Section U.S. EPA Region 3

Re: Comment on Permit #PAS2D702BALL, Penneco Environmental Solutions, Sedat 4A Underground Injection Well

Dear Mr. Hancharick,

As a 501(c) 3 education and advocacy coalition located in North Central Pennsylvania concerned with all aspects of shale gas development, the Responsible Decarbonization Alliance (RDA) is in concurrence with the comments submitted on June 28th by Jenna Rindy, Staff Environmental Scientist at Protect PT asking that permit PAS2D702BALL for Sedat 4A be denied and that the permit for the Sedat 3A fracturing waste injection well to Penneco Energy Solutions be withdrawn.

Living in a shale gas development region of our Commonwealth with a decades-long history of underground methane gas storage, we are very aware that we do not have geological formations suitable for injection wells that are not already in use for storage. We must therefore rely on other regions, primarily in other states, to receive extremely toxic liquid wastes from not just the gas and oil industry, but from all industries in our area with similar waste fluid disposal challenges.

For those communities targeted for injection well operations, we are grateful for EPA oversight on the permitting process. We have seen first hand for 14 years now that state legislatures, state administrations of either party, and the state agencies they fund are not up to the challenge of putting the needs and rights of individuals and families above the desires of oil and gas industry corporations to conduct business, even when there is evidence of harm that has occurred. We expect a higher standard from the EPA especially now while there is a federal administration in place that believes in the mission of the agency and the rights of the public to safe drinking water.

RDA believes Ms. Rindy and Protect PT sum up their argument well in the following paragraph:

Code of Federal Regulations 40 CFR 144.12, which prohibits the movement of fluid into USDWs, provides that no underground injection operator “shall construct or operate in a manner that allows movement of fluid containing any contaminant into USDWs if the contaminant may violate 40 CFR 142.” The permit approval for injection of waste into Sedat 4A has potential to violate 40 CFR 142 and lead to the movement of fluid into USDWs and therefore should not be issued. Our analyses strongly suggest the EPA withdraw permits for the development of Sedat 4A until/unless mitigation to the currently existing well distinctly passes an MIT. This is particularly important as the suggested injection pressure into the Murrysville Formation greatly exceeds the pressure at which the MIT was conducted for Sedat 3A.

Thank you for your consideration of these comments.

Sincerely,

RDA Board of Directors,

Robert Cross, President
Barbara Jarmoska
Mark Szybist
Harvey Katz
Dianne Peeling
Eliza Whyman